Section 1. Registration Information

Source Identification

Facility Name:	COIM USA, Inc.
Parent Company #1 Name:	COIM USA, Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	18-Jul-2019
Postmark Date:	18-Jul-2019
Next Due Date:	18-Jul-2024
Completeness Check Date:	18-Sep-2019
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0008 7764
Other EPA Systems Facility ID:	08066RPRDCBILLI
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	102472029
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	675 Billingsport Road
Street 2:	
City:	Paulsboro
State:	NEW JERSEY
ZIP:	08066
ZIP4:	
County:	GLOUCESTER

Facility Latitude and Longitude

Latitude (decimal):	39.837222
Longitude (decimal):	-075.249167
Lat/Long Method:	Public Land Survey - Footing
Lat/Long Description:	NW Corner of Land Parcel
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	COIM USA, Inc.
Operator Phone:	(856) 224-4819

Mailing Address

Operator Street 1:	675 Billingsport Rd.
Operator Street 2:	
Operator City:	Paulsboro
Operator State:	NEW JERSEY
Operator ZIP:	08066
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Michelangelo Cavallo
RMP Title of Person or Position:	President
RMP E-mail Address:	Michelangelo.cavallo@us.coimgroup.com

Emergency Contact

Emergency Contact Name:	Dave Olsen
Emergency Contact Title:	QEHSSR Manager
Emergency Contact Phone:	(856) 224-8562
Emergency Contact 24-Hour Phone:	(856) 217-6482
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	dave.olsen@coimgroup.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Gloucester County OEM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	18
FTE Claimed as CBI:	

Covered By

OSHA PSM :	
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	07-Mar-2017
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Heather Heacock
Preparer Phone:	(856) 224-8563
Preparer Street 1:	286 Mantua Grove Road
Preparer Street 2:	
Preparer City:	West Deptford
Preparer State:	NEW JERSEY
Preparer ZIP:	08066
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000101667
Description:	Prepolymer Process
Process Chemical ID:	1000127416
Program Level:	Program Level 3 process
Chemical Name:	Toluene diisocyanate (unspecified isomer) [Benzene, 1,3-diisocyanatomethyl-]
CAS Number:	26471-62-5
Quantity (lbs):	461000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000101667
Process NAICS ID:	1000102927
Program Level:	Program Level 3 process
NAICS Code:	325211
NAICS Description:	Plastics Material and Resin Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000081325

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Release Duration (mins):	60
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000086817

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	Portable Foam Application

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000107137
Chemical Name:	Toluene diisocyanate (unspecified isomer) [Benzene, 1,3-diisocyanatomethyl-]
Flammable/Toxic:	Toxic
CAS Number:	26471-62-5
Process ID:	1000101667
Description:	Prepolymer Process
Prevention Program Level 3 ID:	1000085877
NAICS Code:	325211

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	23-Oct-2018

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	30-Sep-2017

The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	Yes
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	

Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Oct-2018

Training

Training Revision Date (The date of the most recent review or revision of training programs):	01-Apr-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	CBT

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	08-Apr-2009
Equipment Inspection Date (The date of the most recent equipment inspection or test):	20-May-2014
Equipment Tested (Equipment most recently inspected or tested):	Inspection of heat exchanger

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	31-Dec-2013
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	27-Sep-2011

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	31-Dec-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	23-Oct-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	01-Jul-2019

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	31-Mar-2009
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	07-May-2009

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	20-Dec-2011

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	23-Jan-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	28-Oct-2015
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	06-Jan-2014

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	25-Jul-2017

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	03-Aug-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	GIBBSTOWN FIRE DEPT
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(609) 423-6580

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	NJ TCPA

Executive Summary

Federal RMP Executive Summary

COIM USA, Inc.
Paulsboro, New Jersey Facility

1. Accidental release prevention and emergency response policies:

At this facility, we manufacture prepolymers. Toluene diisocyanate, in the amounts handled by our facility, are considered hazardous by the EPA. It is our policy to adhere to all applicable Federal and state rules and regulations. COIM USA manages the safety of the regulated processes by means of operating procedures, equipment testing and inspections, safety devices (e.g., alarms, shutdowns, instrumentation, relief devices) inherent in the design of this facility and other controls and systems designed to prevent accidental releases of hazardous chemicals. Safe work practices and training of our personnel supplement the inherent safe design of the plant.

Our site response program is based upon OSHA's HAZWOPER regulation. The emergency response plan includes procedures for the notification of the local fire authority and outside responders so that appropriate measures can be taken by local emergency responders to control accidental releases.

This document has been prepared in accordance with the EPA's Risk Management Plan regulation (40 CFR, Part 68) and the New Jersey Toxic Catastrophe and Prevention Act (N.J.A.C. 7:31). The substances and processes considered during the preparation of this RMP and the scenarios described were selected based on criteria established in these regulations.

2. The stationary source and regulated substances handled:

The primary purpose of this facility is the manufacture of prepolymers. Toluene diisocyanate is used to manufacture the prepolymer products and is received and stored on-site in an aboveground storage tank.

3. The worst-case release scenario(s) and the alternative release scenario(s), including administrative controls and mitigation measures to limit the distance for each reported scenario:

The "worst case scenario" (WCS), as defined by the EPA, associated with a release of toxic toluene diisocyanate is the release of the maximum inventory of toluene diisocyanate contained in the aboveground storage tank into a diked containment area. This full inventory of the largest container is assumed to be all released in 10 minutes. The maximum distance to the EPA defined endpoint for this WCS does not reach public receptors. Although we have active controls directed at preventing such a release and controlling the consequences, no credit for active mitigation measures were taken into account in evaluating this WCS.

The "alternative case scenario" (ACS) for toxic toluene diisocyanate at this facility is a process leak. The maximum distance to the EPA defined toxic endpoint for this ACS does not reach public receptors. No active or passive mitigations were considered in evaluating this ACS.

The actual release rates for the WCS and ACS for the toxic material is less than the release rate entered into Sections 2 or 3 of the RMP resubmission. The release rates entered in Sections 2 and 3 are the minimum entries that can be inputed into this field.

4. The general accidental release prevention program and specific prevention steps:

The facility developed prevention program elements based on the Federal EPA's Accidental Release Prevention Plan, and the New Jersey Toxic Catastrophe and Prevention Act (NJ TCPA). This facility was designed and constructed to comply with applicable state and industry codes.

5. Five-year accident history:

There have been no accidents involving accidental release of TDI within the last 5 years that resulted in any deaths, injuries, or significant property damage on site, or known off-site deaths, injuries, evacuations, sheltering in place, property damage, or

environmental damage..

6. The emergency response program:

The facility's response program is based upon OSHA's HAZWOPER standard. At this site, employees are trained to recognize emergencies and initiate emergency response from outside agencies. They have been trained to OSHA's First Responder Awareness Level and First Responder Operations Level. The employees receive annual refresher training in their role in the emergency plan. Emergency response activities have also been coordinated with the local Fire Department for incidents related to both regulated chemicals. Periodic drills are conducted to review the effectiveness of our emergency procedures.

7. Planned changes to improve safety:

The facility resolves recommendations from PHAs and Incident Investigations, some of which may result in modifications to the plant design and operating procedures. However, at this time no major administrative, operational, process, or equipment changes are planned for this facility.